

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

STEPHEN MCCAUSLAND, an individual,  
Plaintiff,

vs.

MICHAEL V. LONG and ELIZABETH  
LONG, husband and wife and the marital  
community composed thereof; and  
RENAISSANCE CHIROPRACTIC CENTER,  
P.S.; jointly and severally,  
Defendants.

Case No. 3:16-cv-05018

**VERIFICATION OF STATE COURT  
RECORDS**

Defendants Michael V. Long, Elizabeth Long and Renaissance Chiropractic Center, P.S.,  
by and through their undersigned counsel of record, hereby certify that true and correct copies of  
all records and proceedings from the state court action, *McCausland v. Long, et al.*, Pierce  
County Superior Court Cause No. 15-2-12191-5, as they existed on January 8, 2016, are attached  
as Exhibit A. These include the items listed below, and are exclusive of the Complaint and Jury  
Demand which were attached to the Notice of Removal already on file in this Court.

- Case Information Cover Sheet;
- Order Setting Original Case Schedule;
- Summonses (3);
- Declarations of Service on Defendants (3);
- Notice of Appearance;

DEFS' VERIFICATION OF STATE  
COURT PLEADINGS - 1

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98042  
(253) 383-4500 - (253) 383-4501 (fax)

# EXHIBIT A

September 17 2015 12:33 PM

KEVIN STOCK  
COUNTY CLERK  
NO: 15-2-12191-5**SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY  
CASE COVER SHEET / CIVIL CASES**

Case Title STEPHEN MCCAUSLAND VS. MICHAEL V. LONG Case Number 15-2-12191-5  
 Atty/Litigant THOMAS BRADLEY NEDDERMAN Bar # 28944 Phone (206) 441-4455  
 Address 200 W Thomas St Ste 500  
 City SEATTLE State WA Zip 98119  
 Please check one category that best describes this case for indexing purposes.

*If you cannot determine the appropriate category, please describe the cause of action below. This will create a Miscellaneous cause which is not subject to PCLR3*

**APPEAL / REVIEW**

- ☐ Administrative Law Review (ALR 2) *REV 6*  
☐ Civil, Non-Traffic (LCA 2) *REV 6*  
☐ Civil, Traffic (LCI 2) *REV 6*  
☐ Land Use Petition (LUP 2) LUPA

**CONTRACT / COMMERCIAL**

- ☐ Breach of Contract, Commercial Non-Contract  
 or Commercial-Contract (COM 2) *STANDARD*  
☐ Third Party Collection (COL 2) *REV 4*

**JUDGMENT**

- ☐ Judgment, Another County or Abstract  
 Only (ABJ 2) *Non PCLR*  
☐ Transcript of Judgment (TRJ 2) *Non PCLR*  
☐ Foreign Judgment Civil or Judgment,  
 Another State (FJU 2) *Non PCLR*

**TORT / MOTOR VEHICLE**

- ☐ Death, Non-Death Injuries or Property  
 Damage Only (TMV 2) *STANDARD*

**TORT / NON MOTOR VEHICLE**

- ☐ Other Malpractice (MAL 2) *COMPLEX*  
☐ Personal Injury (PIN 2) *STANDARD*  
☐ Property Damage (PRP 2) *STANDARD*  
☐ Wrongful Death (WDE 2) *STANDARD*  
☒ Other Tort, Products Liability or Asbestos  
 (TTO 2) *COMPLEX*

**PROPERTY RIGHTS**

- ☐ Condemnation (CON 2) *STANDARD*  
☐ Foreclosure (FOR 2) *REV 4*  
☐ Property Fairness (PFA 2) *STANDARD*  
☐ Quiet Title (QTI 2) *STANDARD*  
☐ Unlawful Detainer / Eviction (UND 2) *REV 4*  
☐ Unlawful Detainer / Contested (UND 2) *REV 4*

**OTHER COMPLAINT OR PETITION**

- ☐ Compel/Confirm Bind Arbitration, Deposit of Surplus Funds,  
 Interpleader, Subpoenas, Victims' Employment Leave, or  
 Wireless Number Disclosure, Miscellaneous (MSC 2) *REV 4*  
☐ Injunction (INJ 2) *REV 4*  
☐ Malicious Harassment (MHA 2) *Non PCLR*  
☐ Meretricious Relationship (MER 2) *REV 4*  
☐ Minor Settlement/No Guardianship (MST2) *REV 4*  
☐ Pet for Civil Commit/Sex Predator (PCC2) *REV 4*  
☐ Property Damage Gangs (PRG 2) *REV 4*  
☐ Relief from Duty to Register (RDR) *REV 12*  
☐ Restoration of Firearm Rights (RFR 2) *REV 4*  
☐ Seizure of Property/Comm. of Crime (SPC2) *REV 4*  
☐ Seizure of Property Result from Crime (SPR2) *REV 4*  
☐ Trust/Estate Dispute Resolution (TDR2) *REV 12*

**TORT / MEDICAL MALPRACTICE**

- ☐ Hospital, Medical Doctor, or Other Health Care Professional  
 (MED2) *COMPLEX*

**WRIT**

- ☐ Habeas Corpus (WHC 2) *REV 4*  
☐ Mandamus (WRM 2) *REV 4*  
☐ Review (WRV 2) *REV 4*  
☐ Miscellaneous Writ (WMW 2) *REV 4*

Miscellaneous \_\_\_\_\_

Revised 10/17/14

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR PIERCE COUNTY**

September 17 2015 12:33 PM

KEVIN STOCK  
COUNTY CLERK  
**NO: 15-2-12191-5**

STEPHEN MCCAUSLAND

Plaintiff(s)

Vs.

MICHAEL V. LONG

Defendant(s)

No. 15-2-12191-5

**ORDER SETTING CASE SCHEDULE**

Type of case:	TTO
Estimated Trial (days):	
Track Assignment:	Complex
Assignment Department:	04
Docket Code:	<b>ORSCS</b>

Confirmation of Service	10/29/2015
Confirmation of Joinder of Parties, Claims and Defenses	3/17/2016
Jury Demand	3/24/2016
Status Conference (Contact Court for Specific Date)	Week of 4/28/2016
Plaintiff's/Petitioner's Disclosure of Primary Witnesses	6/9/2016
Defendant's/Respondent's Disclosure of Primary Witnesses	7/7/2016
Disclosure of Rebuttal Witnesses	10/20/2016
Deadline for Filing Motion to Adjust Trial Date	11/10/2016
Discovery Cutoff	12/29/2016
Exchange of Witness and Exhibit Lists and Documentary Exhibits	1/19/2017
Deadline to file Certificate or Declaration re: Alternative Dispute Resolution (PCLR 16 (c)(3))	2/2/2017
Deadline for Hearing Dispositive Pretrial Motions	2/2/2017
Joint Statement of Evidence	2/2/2017
Pretrial Conference (Contact Court for Specific Date)	Week of 2/23/2017
Trial	3/16/2017 9:00

**Unless otherwise instructed, ALL Attorneys/Parties shall report to the trial court at 9:00 AM on the date of trial.**

**NOTICE TO PLAINTIFF/PETITIONER**

If the case has been filed, the plaintiff shall serve a copy of the Case Schedule on the defendant(s) with the summons and complaint/petition: Provided that in those cases where service is by publication the plaintiff shall serve the Case Schedule within five (5) court days of service of the defendant's first response/appearance. If the case has not been filed, but an initial pleading is served, the Case Schedule shall be served within five (5) court days of filing. See PCLR 3.

**NOTICE TO ALL PARTIES**

All attorneys and parties shall make themselves familiar with the Pierce County Local Rules, particularly those relating to case scheduling. Compliance with the scheduling rules is mandatory and failure to comply shall result in sanctions appropriate to the violation. If a statement of arbitrability is filed, PCLR 3 does not apply while the case is in arbitration.

Dated: September 17, 2015



Judge BRYAN CHUSHCOFF

Department 04

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

September 17 2015 12:33 PM

KEVIN STOCK  
COUNTY CLERK  
**NO: 15-2-12191-5**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCAUSLAND, an individual;

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof ; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S.; jointly and  
severally,

Defendants.

NO.

**SUMMONS**

**TO: MICHAEL LONG, Defendant.**

A lawsuit has been started against you in the above entitled court by Plaintiff Stephen McCausland, and each claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the Plaintiff, Stephen McCausland, is entitled to what is asked for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

SUMMONS - 1

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

EX A TO VERIFICATION - 7

1  
2 You may demand that the Plaintiff file the Complaint with the court. If you do so, the  
3 demand must be in writing and must be served upon the person signing this summons. Within  
4 fourteen (14) days after you serve the demand, the Plaintiff, Stephen McCausland, must file  
5 this lawsuit with the court, or the service on you of this summons and third party complaint will  
be void. If you wish to seek the advice of an attorney in this matter, you should do so promptly  
so that your written response, if any, may be served on time.

6 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the  
7 State of Washington.

8 DATED this 17<sup>th</sup> day of September, 2015.

9 FLOYD, PFLUEGER & RINGER, P.S.

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11 By: 

12 Thomas B. Nedderman, WSBA No. 28944  
13 Attorney for Plaintiff  
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SUMMONS - 2

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

September 17 2015 12:33 PM

KEVIN STOCK  
COUNTY CLERK  
**NO: 15-2-12191-5**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCAUSLAND, an individual;

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof ; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S.; jointly and  
severally,

Defendants.

NO.

**SUMMONS**

**TO: ELIZABETH LONG, Defendant.**

A lawsuit has been started against you in the above entitled court by Plaintiff Stephen McCausland, and each claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the Plaintiff, Stephen McCausland, is entitled to what is asked for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

SUMMONS - 1

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

EX A TO VERIFICATION - 9

1  
2 You may demand that the Plaintiff file the Complaint with the court. If you do so, the  
3 demand must be in writing and must be served upon the person signing this summons. Within  
4 fourteen (14) days after you serve the demand, the Plaintiff, Stephen McCausland, must file  
5 this lawsuit with the court, or the service on you of this summons and third party complaint will  
6 be void. If you wish to seek the advice of an attorney in this matter, you should do so promptly  
7 so that your written response, if any, may be served on time.

8 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the  
9 State of Washington.

10 DATED this 17<sup>th</sup> day of September, 2015.

11 FLOYD, PFLUEGER & RINGER, P.S.

12 By: 

13 Thomas B. Nedderman, WSBA No. 28944  
14 Attorney for Plaintiff  
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SUMMONS - 2

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484



E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

September 17 2015 12:33 PM

KEVIN STOCK  
COUNTY CLERK  
**NO: 15-2-12191-5**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCAUSLAND, an individual;

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof ; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S.; jointly and  
severally,

Defendants.

NO.

**SUMMONS**

**TO: RENAISSANCE CHIROPRACTIC CENTER, P.S, Defendant.**

A lawsuit has been started against you in the above entitled court by Plaintiff Stephen McCausland, and each claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the Plaintiff, Stephen McCausland, is entitled to what is asked for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

SUMMONS - 1

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

1  
2 You may demand that the Plaintiff file the Complaint with the court. If you do so, the  
3 demand must be in writing and must be served upon the person signing this summons. Within  
4 fourteen (14) days after you serve the demand, the Plaintiff, Stephen McCausland, must file  
5 this lawsuit with the court, or the service on you of this summons and third party complaint will  
6 be void. If you wish to seek the advice of an attorney in this matter, you should do so promptly  
7 so that your written response, if any, may be served on time.

8 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the  
9 State of Washington.

10 DATED this 11 day of September, 2015.

11 FLOYD, PFLUEGER & RINGER, P.S.

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13 By: \_\_\_\_\_

14 Thomas B. Nedderman, WSBA No. 28944  
15 Attorney for Plaintiff

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SUMMONS - 2

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

September 24 2015 1:42 PM

KEVIN STOCK  
COUNTY CLERK  
NO: 15-2-12191-5

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF PIERCE, STATE OF WASHINGTON

**STEPHEN MCCAUSLAND, AN INDIVIDUAL**

Plaintiff/Petitioner

Cause No.: **15-2-12191-5**

Hearing Date:

vs.

**MICHAEL V. LONG AND ELIZABETH LONG,  
HUSBAND AND WIFE AND THE MARITAL  
COMMUNITY COMPOSED THEREOF; ET AL.**

Defendant/Respondent

DECLARATION OF SERVICE OF  
SUMMONS; COMPLAINT FOR DAMAGES; ORDER  
SETTING CASE SCHEDULE; CASE COVER SHEET  
SHEET/CIVIL CASES

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the **23rd day of September, 2015 at 3:15 PM** at the address of **4913 69TH AVE CT W, UNIVERSITY PLACE, Pierce County, WA 98467**; this declarant served the above described documents upon **MICHAEL V. LONG** by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **Jacob Long, DESCENDANT, CO-RESIDENT, who accepted service, with identity confirmed by verbal communication, a brown-haired White male approx. 14-17 years of age, 5'7"-5'9" tall and weighing 120-140 lbs. Elizabeth Long drove up (554-XXE) Blonde haired White female approx. 30-40 years of age, 5'6"- 5'8" tall and weighing 120-140 lbs. I told her I just served her son legal papers for, Mike & Elizabeth. , a person of suitable age and discretion who stated they reside at the defendant's/respondent's usual place of abode listed above.**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 2

For: **Floyd & Pflueger**  
Ref #: **MCCAUSLAND**Tracking #: **0008691200**

PLAINTIFF/PETITIONER: STEPHEN MCCAUSLAND, AN INDIVIDUAL	CASE NUMBER:
DEFENDANT/RESPONDENT: MICHAEL V. LONG AND ELIZABETH LONG, HUSBAND AND WIFE AND THE MARITAL COMMUNITY COMPOSED THEREOF; ...	15-2-12191-5

Service Fee Total: \$ 69.50

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED Sept 24 2015.

*SH*

Sean Hickey, Reg. # 14340, Pierce County, WA

ORIGINAL PROOF OF SERVICE

PAGE 2 OF 2



For: Floyd & Pflueger  
Ref #: MCCAUSLAND

Tracking #: 0008691200



September 24 2015 9:23 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 15-2-12191-5

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF PIERCE, STATE OF WASHINGTON

**STEPHEN MCCAUSLAND, AN INDIVIDUAL**

Plaintiff/Petitioner

Cause No.: **15-2-12191-5**

Hearing Date:

vs.

**MICHAEL LONG AND ELIZABETH LONG,  
HUSBAND AND WIFE AND THE MARITAL  
COMMUNITY COMPOSED THEREOF; ET AL.**

Defendant/Respondent

DECLARATION OF SERVICE OF  
SUMMONS; COMPLAINT FOR DAMAGES; ORDER  
SETTING CASE SCHEDULE; CASE COVER SHEET/CIVIL  
CASES

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the **22nd day of September, 2015** at **5:45 PM** at the address of **4902 TACOMA MALL BLVD, TACOMA, Pierce County, WA 98409**; this declarant served the above described documents upon **RENAISSANCE CHIROPRACTIC CENTER, P.S.** by then and there personally delivering **1** true and correct copy(ies) thereof, by then presenting to and leaving the same with **Doug Long , CO-OWNER, PERSON AUTHORIZED TO ACCEPT, who accepted service, with identity confirmed by verbal communication, a gray-haired with balding white male approx. 45-55 years of age, 6'0"-6'2" tall and weighing 180-200 lbs..**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: \$ **69.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

September 22, 2015

DATED \_\_\_\_\_.

\_\_\_\_\_  
Trenton Bellesen, Reg. # PC # 25931, Pierce

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1

Tracking #: 0008675494

For: Floyd & Pflueger  
Ref #: MCCAUSLAND B

September 28 2015 2:49 PM

KEVIN STOCK  
COUNTY CLERK  
NO: 15-2-12191-5

## IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF PIERCE, STATE OF WASHINGTON

**STEPHEN MCCAUSLAND, AN INDIVIDUAL**

Plaintiff/Petitioner

Cause No.: **15-2-12191-5**

Hearing Date:

vs.

**MICHAEL LONG AND ELIZABETH LONG, HUSBAND  
AND WIFE AND THE MARITAL COMMUNITY  
COMPOSED THEREOF; ET AL.**

Defendant/Respondent

DECLARATION OF SERVICE OF  
SUMMONS; COMPLAINT FOR DAMAGES; ORDER  
SETTING CASE SCHEDULE; CASE COVER SHEET/CIVIL  
CASES

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the **23rd day of September, 2015 at 3:15 PM** at the address of **4913 69TH AVE CT W, UNIVERSITY PLACE, Pierce County, WA 98467**; this declarant served the above described documents upon **ELIZABETH LONG** by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **Jacob Long, DESCENDANT, CO-RESIDENT, who accepted service, with identity confirmed by verbal communication, a brown-haired White male approx. 14-17 years of age, 5'7"-5'9" tall and weighing 120-140 lbs. Elizabeth Long drove up (554-XXE) Blonde haired White female approx. 30-40 years of age, 5'6"- 5'8" tall and weighing 120-140 lbs. I told her I just served her son legal papers for, Mike & Elizabeth. , a person of suitable age and discretion who stated they reside at the defendant's/respondent's usual place of abode listed above.**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

## ORIGINAL PROOF OF SERVICE

PAGE 1 OF 2

For: **Floyd & Pflueger**  
Ref #: **MCCAUSLAND A**Tracking #: **0008705649**

PLAINTIFF/PETITIONER: STEPHEN MCCAUSLAND, AN INDIVIDUAL	CASE NUMBER:
DEFENDANT/RESPONDENT: MICHAEL LONG AND ELIZABETH LONG, HUSBAND AND WIFE AND THE MARITAL COMMUNITY COMPOSED THEREOF; ET ...	15-2-12191-5

Service Fee Total: \$ **69.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED Sept 25 2015.

*SH*

\_\_\_\_\_  
**Sean Hickey, Reg. # 14340, Pierce County, WA**

**ORIGINAL PROOF OF SERVICE**

PAGE 2 OF 2



For: **Floyd & Pflueger**  
Ref #: **MCCAUSLAND A**

Tracking #: **0008705649**



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCLAUSLAN, an individual,

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S., jointly and  
severally,

Defendants.

Case No.: 15-2-12191-5

NOTICE OF APPEARANCE FOR  
DEFENDANTS MICHAEL LONG,  
ELIZABETH LONG, AND  
RENAISSANCE CHIROPRACTIC  
CENTER, P.S.

**[CLERK'S ACTION REQUIRED]**

TO: CLERK OF THE ABOVE REFERENCED COURT

AND TO: STEPHAN McCAUSLAND, and his attorney

YOU WILL TAKE NOTICE that the undersigned, Spencer D. Freeman, Freeman Law Firm, Inc., is appearing as counsel for Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. in the above-entitled matter. As such, it is requested that

NOTICE OF APPEARANCE FOR DEFENDANTS

- 1

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98042  
(253) 383-4500 - (253) 383-4501 (fax)



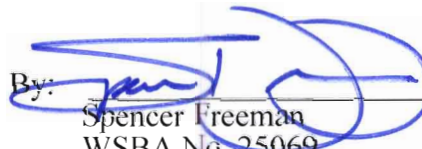
1 copies of all papers and pleadings herein be served upon the undersigned at the offices located at:  
2 1107 ½ Tacoma Avenue South, Tacoma, Washington 98402.

3 You are not authorized to serve any pleadings, discovery, or correspondence by way of  
4 facsimile or email unless specifically, per each document, negotiated to do so with the  
5 undersigned counsel. Such authorization will only be conditioned and accepted upon service on  
6 this office during the hours of 9:00 a.m. through 4:30 p.m., Pacific Standard Time, on Monday  
7 through Friday, unless deemed a court holiday.

8 DATED: September 28, 2015.  
9

10 Respectfully submitted,

11 FREEMAN LAW FIRM, INC.  
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14 By:   
15 Spencer Freeman  
16 WSBA No. 25069  
17 Attorney for Defendants  
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NOTICE OF APPEARANCE FOR DEFENDANTS

- 2

**FREEMAN LAW FIRM, INC.**

1107 ½ Tacoma Avenue South

Tacoma, WA 98042

(253) 383-4500 - (253) 383-4501 (fax)

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCAUSLAND, an individual,

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S., jointly and  
severally,

Defendants.

Case No.: 15-2-12191-5

DEFENDANTS ANSWER TO  
COMPLAINT FOR DAMAGES,  
AFFIRMATIVE DEFENSES AND  
DEFENDANT MICHAEL LONG'S  
COUNTERCLAIMS

COMES NOW DEFENDANTS MICHAEL LONG, ELIZABETH LONG, and  
RENAISSANCE CHIROPRACTIC CENTER, P.S., by and through their undersigned counsel of  
record, Spencer D. Freeman, Freeman Law Firm, Inc., and submit the following Answer,  
Affirmative Defenses, and DEFENDANT MICHAEL LONG'S COUNTERCLAIM.

**I. PARTIES**

1. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 1.1 of the Complaint For Damages.

DEFENDANT LIBERTY BAIL BONDS, INC.'S  
ANSWER AND AFFIRMATIVE DEFENSES

- 1

**FREEMAN LAW FIRM, INC.**

1107 ½ Tacoma Avenue South

Tacoma, WA 98042

(253) 383-4500 - (253) 383-4501 (fax)

2. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. admit the allegations in Paragraph 1.2 of the Complaint For Damages.

3. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 1.3 of the Complaint For Damages.

## II. JURISDICTION AND VENUE

4. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 2.1 of the Complaint For Damages to the extent that Plaintiff is a resident of Pierce County and admits the remaining allegations in Paragraph 2.1 of the Complaint For Damages.

## III. STATEMENT OF FACTS

5. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.1 of the Complaint For Damages.

6. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. admit the allegations in Paragraph 3.2 of the Complaint For Damages.

7. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.3 of the Complaint For Damages.

8. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. admit the allegations in Paragraph 3.4 of the Complaint For Damages.

9. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.5 of the Complaint For Damages to the extent that the description of the flags applies to all flags used or the flags used by Michael Long and deny that the flags “often shift so that the flags fall down the front center of the waist near the crotch.”

Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. otherwise admit the allegations in Paragraph 3.5 of the Complaint For Damages.

10. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.6 of the Complaint For Damages.

11. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.7 of the Complaint For Damages.

12. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.8 of the Complaint For Damages.

13. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.9 of the Complaint For Damages.

14. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.10 of the Complaint For Damages.

15. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. admit the allegations in Paragraph 3.11 of the Complaint For Damages.

16. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. admit the allegations in Paragraph 3.12 of the Complaint For Damages.

17. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.13 of the Complaint For Damages.

18. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.14 of the Complaint For Damages.

19. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.15 of the Complaint For Damages.

20. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.16 of the Complaint For Damages.

21. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.17 of the Complaint For Damages.

22. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.18 of the Complaint For Damages.

23. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.19 of the Complaint For Damages.

DEFENDANT LIBERTY BAIL BONDS, INC.'S  
ANSWER AND AFFIRMATIVE DEFENSES

- 3

**FREEMAN LAW FIRM, INC.**  
1107 ½ Tacoma Avenue South  
Tacoma, WA 98042  
(253) 383-4500 - (253) 383-4501 (fax)

24. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.20 of the Complaint For Damages.

25. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.21 of the Complaint For Damages.

26. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.22 of the Complaint For Damages.

27. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.23 of the Complaint For Damages.

28. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.24 of the Complaint For Damages.

29. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.25 of the Complaint For Damages.

30. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.26 of the Complaint For Damages.

31. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.27 of the Complaint For Damages.

32. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.28 of the Complaint For Damages.

33. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. lack sufficient information regarding the allegations in Paragraph 3.29 of the Complaint For Damages, and therefore deny the same.

34. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.30 of the Complaint For Damages.

35. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 3.31 of the Complaint For Damages.

36. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,



P.S. deny the allegations in Paragraph 3.32 of the Complaint For Damages.

37. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.33 of the Complaint For Damages.

38. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 3.34 of the Complaint For Damages.

#### IV. CAUSES OF ACTION

##### A. First Claim for Relief: Defamation *Per Se*

39. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. reassert all answers to paragraphs 1 through 3.34 of the Complaint for damages, in response  
to Paragraph 4.1 of the Complaint For Damages.

40. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.2 of the Complaint For Damages.

41. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.3 of the Complaint For Damages.

42. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.4 of the Complaint For Damages.

43. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.5 of the Complaint For Damages.

44. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.6 of the Complaint For Damages.

45. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. deny the allegations in Paragraph 4.7 of the Complaint For Damages.

##### B. Second Claim for Relief: Defamation

46. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,  
P.S. reassert all answers to paragraphs 1 through 4.7 of the Complaint for damages, in response  
to Paragraph 4.8 of the Complaint For Damages.

47. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.9 of the Complaint For Damages.

48. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.10 of the Complaint For Damages.

49. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.11 of the Complaint For Damages.

50. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.12 of the Complaint For Damages.

51. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.13 of the Complaint For Damages.

52. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.14 of the Complaint For Damages.

**C. Third Claim for Relief: Libel *Per Se***

53. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. reassert all answers to paragraphs 1 through 4.14 of the Complaint for damages, in response to Paragraph 4.15 of the Complaint For Damages.

54. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.16 of the Complaint For Damages.

55. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.17 of the Complaint For Damages.

56. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.18 of the Complaint For Damages.

57. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.19 of the Complaint For Damages.

58. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.20 of the Complaint For Damages.

**D. Fourth Claim for Relief: Slander**

59. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. reassert all answers to paragraphs 1 through 4.20 of the Complaint for damages, in response to Paragraph 4.21 of the Complaint For Damages.

60. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.22 of the Complaint For Damages.

61. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.23 of the Complaint For Damages.

62. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.24 of the Complaint For Damages.

63. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.25 of the Complaint For Damages.

64. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.26 of the Complaint For Damages.

**E. Fifth Claim for Relief: Outrage and Intentional Infliction of Emotional Distress**

65. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. reassert all answers to paragraphs 1 through 4.26 of the Complaint for damages, in response to Paragraph 4.27 of the Complaint For Damages.

66. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.28 of the Complaint For Damages.

67. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.29 of the Complaint For Damages.

68. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.30 of the Complaint For Damages.

69. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center,



P.S. deny the allegations in Paragraph 4.31 of the Complaint For Damages.

70. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.32 of the Complaint For Damages.

71. Defendants Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. deny the allegations in Paragraph 4.33 of the Complaint For Damages.

### AFFIRMATIVE DEFENSES

72. Plaintiff's claims are barred, in whole or in part, by Plaintiff's failure to mitigate damages.

73. Plaintiff's damages, if any, are proximately caused by Plaintiff's own conduct, negligence, fault, and/or comparative fault for which Defendant is neither answerable nor responsible.

74. Plaintiff's damages, if any, may have been the result of acts, omissions, conditions or fault of third persons over whom Defendant had no control or right of control.

75. In the event that Plaintiff is awarded damages against Defendant, then Defendants are entitled to an offset for Plaintiff's own negligence and fault, and the negligence and fault of other parties and non-parties.

76. Defendants reserve the right to amend this Answer to include additional claims or defenses as may be required.

### DEFENDANT MICHAEL LONG'S COUNTERCLAIM AGAINST PLAINTIFF

#### A. First Claim: Sexual Battery November 2013.

77. Plaintiff/CounterClaim Defendant McCausland was, at all relevant times herein, employed, in part, as a youth pastor at Sunset Bible Church, in University Place, Washington.

78. Defendant/CounterClaim Plaintiff Michael Long was, at all relevant times herein, a member of the congregation at Sunset Bible Church, in University Place, Washington.

79. Sunset Bible Church holds, and held, an annual flag football game during Thanksgiving weekend for its congregation and parishioners.

80. McCausland and Michael Long were both participants in the Sunset Bible Church annual flag football game in November 2013.

81. During the November 2013 flag football game, McCausland engaged in offensive and/or harmful sexual contact against Michael Long by grabbing and holding on to Michael Long's genitals.

82. McCausland intended to grab and hold Michael Long's genitals.

83. McCausland's act in grabbing Michael Long's genitals caused injury to Michael Long, including mental anguish and emotional distress.

**B. Second Claim: Sexual Battery November 2014.**

84. Defendant/CounterClaim Plaintiff Michael Long repeats, re-alleges, and incorporates by reference each and every preceding allegation set forth herein.

85. Plaintiff/CounterClaim Defendant McCausland was, at all relevant times herein, employed, in part, as a youth pastor at Sunset Bible Church, in University Place, Washington.

86. Defendant/CounterClaim Plaintiff Michael Long was, at all relevant times herein, a member of the congregation at Sunset Bible Church, in University Place, Washington.

87. Sunset Bible Church holds, and held, an annual flag football game during Thanksgiving weekend for its congregation and parishioners.

88. McCausland and Michael Long were both participants in the Sunset Bible Church annual flag football game in November 2014.

89. During the November 2014 flag football game, McCausland engaged in offensive and/or harmful sexual contact against Michael Long by grabbing and holding on to Michael Long's genitals.

90. McCausland intended to grab and hold Michael Long's genitals.

91. McCausland's act in grabbing Michael Long's genitals caused injury to Michael Long, including mental anguish and emotional distress.

**PRAYER FOR RELIEF**

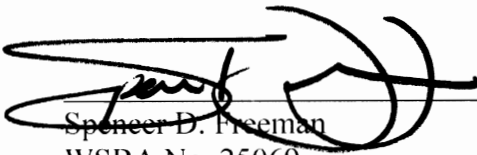
**PRAYER FOR RELIEF**

Wherefore, Michael Long, Elizabeth Long, and Renaissance Chiropractic Center, P.S. request this Court grant the following relief:

1. Deny all of Plaintiff's request for damages;
  2. Monetary award for damages suffered by Michael Long in an amount to be proven at trial;
  3. Costs of litigation, including reasonable attorney fees and costs; and
- Such other relief as the Court deems just and proper.

Dated this 12<sup>th</sup> day of October, 2015.

**FREEMAN LAW FIRM, INC.**



Spencer D. Freeman  
WSBA No. 25069  
FREEMAN LAW FIRM, INC.  
1107 1/2 Tacoma Avenue South  
Tacoma, WA 98402  
Telephone: (253) 383-4500  
Facsimile: (253) 383-4501  
sfreeman@freemanlawfirm.org

Attorney for Defendants/CounterClaim Plaintiff

HONORABLE BRYAN CHUSHCOFF

RECEIVED

FREEMAN LAW FIRM, INC.

10.30.15  
10.30.15  
N/A

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE

STEPHEN MCCAUSLAND, an individual;

Plaintiff,

vs.

MICHAEL LONG and ELIZABETH LONG,  
husband and wife and the marital community  
composed thereof ; and RENAISSANCE  
CHIROPRACTIC CENTER, P.S.; jointly and  
severally,

Defendants.

NO. 15-2-12191-5

PLAINTIFF'S ANSWER TO  
DEFENDANT MICHAEL LONG'S  
COUNTERCLAIM

COMES NOW the Plaintiff Stephen McCausland, by and through his attorney of  
record, and hereby Answers Defendant Michael Long's Counterclaim as follows:

**A. First Claim: Sexual Battery November 2013**

1. In answer to Paragraph 77 of the Counterclaim, Plaintiff admits the same.
2. In answer to Paragraph 78 of the Counterclaim, Plaintiff admits the same.
3. In answer to Paragraph 79 of the Counterclaim, Plaintiff admits the same.
4. In answer to Paragraph 80 of the Counterclaim, Plaintiff admits the same.
5. In answer to Paragraph 81 of the Counterclaim, Plaintiff denies the same.

PLAINTIFF'S ANSWER TO DEFENDANT MICHAEL  
LONG'S COUNTERCLAIM - 1

FLOYD, PFLUEGER & RINGER P.S.  
200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

COPY

6. In answer to Paragraph 82 of the Counterclaim, Plaintiff denies the same.

7. In answer to Paragraph 83 of the Counterclaim, Plaintiff denies the same.

**B. Second Claim: Sexual Battery November 2014**

8. In answer to Paragraph 84 of the Counterclaim, the Plaintiff incorporates by reference its each and every preceding allegation as though fully set forth herein.

8. In answer to Paragraph 85 of the Counterclaim, Plaintiff admits the same.

9. In answer to Paragraph 86 of the Counterclaim, Plaintiff admits the same.

10. In answer to Paragraph 87 of the Counterclaim, Plaintiff admits the same.

11. In answer to Paragraph 88 of the Counterclaim, Plaintiff admits the same.

12. In answer to Paragraph 89 of the Counterclaim, Plaintiff denies the same.

13. In answer to Paragraph 90 of the Counterclaim, Plaintiff denies the same.

14. In answer to Paragraph 91 of the Counterclaim, Plaintiff denies the same.

**PRAYER FOR RELIEF**

Plaintiff denies that Defendant Michael Long is entitled to any of the relief sought in that section of his Counterclaim entitled "Prayer for Relief."

**AFFIRMATIVE DEFENSES**

Without admitting any of the allegations previously denied, Plaintiff McCausland alleges the following by way of affirmative defenses:

1. Defendant Michael Long's counterclaim fails to state a claim upon which relief can be granted.
2. No act or omission of the Plaintiff proximately caused the alleged damage to Defendant Michael Long.

PLAINTIFF'S ANSWER TO DEFENDANT MICHAEL LONG'S COUNTERCLAIM - 2

FLOYD, PFLUEGER & RINGER P.S.  
200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484



3. Defendant Michael Long's injuries and/or damages are the result of pre-existing injuries, physical conditions, and/or psychological conditions.
4. Defendant Michael Long has failed to fully mitigate his alleged damages, and has failed to protect himself from avoidable consequences.
5. Plaintiff hereby reserves the right to assert additional affirmative defenses that may be identified through continuing investigation and discovery in this matter, or abandon any affirmative defense herein asserted as future discovery dictates.

**PLAINTIFF'S PRAYER FOR RELIEF**

WHEREFORE, having answered Defendant Michael Long's Counterclaim and asserted affirmative defenses thereto, Plaintiff prays as follows:

1. That Defendant Michael Long's Counterclaim be dismissed with prejudice and without costs;
2. That the Plaintiff be awarded its costs and attorneys' fees incurred in the defense of this Counterclaim; and
3. For other such and equitable relief that the Court deems appropriate.

DATED this 28<sup>th</sup> day of October, 2015.

FLOYD, PFLUEGER & RINGER, P.S.

By: 

Thomas B. Neaderman, WSBA No. 28944  
Attorney for Plaintiff Stephen McCausland

PLAINTIFF'S ANSWER TO DEFENDANT MICHAEL  
LONG'S COUNTERCLAIM - 3

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

CERTIFICATE OF SERVICE

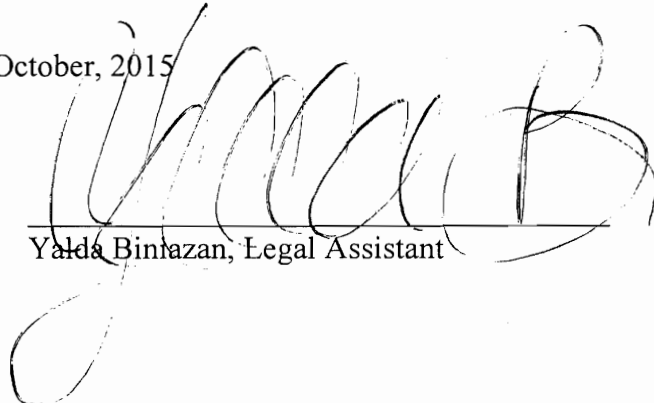
The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date noted below, a true and correct copy of the foregoing was delivered and/or transmitted in the manner(s) noted below:

Spencer Freeman  
Freeman Law Firm  
1107 1/2 Tacoma Avenue South  
Tacoma, WA 98402

*Counsel for Defendants*  
*Michael Long, Elizabeth*  
*Long and Renaissance*  
*Chiropractic Center, PS*

☒ Via Messenger  
☒ Via Email  
☐ Via Facsimile  
☐ Via U.S. Mail

DATED this 28<sup>th</sup> day of October, 2015

  
\_\_\_\_\_  
Yalda Binfazan, Legal Assistant

PLAINTIFF'S ANSWER TO DEFENDANT MICHAEL FLOYD, PFLUEGER & RINGER P.S.  
LONG'S COUNTERCLAIM - 4

200 W. THOMAS ST., SUITE 500  
SEATTLE, WA 98119-4296  
TEL 206 441-4455  
FAX 206 441-8484

- Defendants' Answer, Affirmative Defenses and Defendant Michael Long's Counterclaims;
- Plaintiff's Answer to Defendant Michael Long's Counterclaims;
- Notice to Pierce County Superior Court of Filing Notice of Removal to the United States District Court for the Western District of Washington;

DATED this 8<sup>th</sup> day of January, 2016.

**FREEMAN LAW FIRM, INC.**

By /s/ Spencer D. Freeman  
Spencer D. Freeman, WSBA No. 25069  
1107 ½ Tacoma Avenue South  
Tacoma, Washington 98042  
253-383-4500  
253-383-45101 (fax)  
sfreeman@freemanlawfirm.org

Attorneys for Defendants Michael V. Long,  
Elizabeth Long and Renaissance Chiropractic  
Center, P.S.



**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on all parties of record via electronic transmission or, if not registered for receipt of notice of electronic filings, by facsimile and/or first class mail.

**Counsel for Plaintiff:**

Thomas Nedderman  
Floyd, Pflueger & Ringer P.S.  
200 W. Thomas St., Suite 500  
Seattle, WA 98119  
206-441-4455  
206-441-8484 (fax)  
tnedderman@floyd-ringer.com

DATED: January 8<sup>th</sup>, 2016.

/s/ Spencer D. Freeman  
Spencer D. Freeman  
FREEMAN LAW FIRM, INC.